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DATE FILED: 10/2/18

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLLEEN DOWELL,

Civ. No. 16-cv-6819 (NRB)

Plaintiff,

- against -

EXTENSION OF
PROTECTIVE ORDER TO
DEFENDANTS REMAINING
AFTER REMANDCITY OF NEW YORK, DETECTIVE DOUGLAS
STRONG, 3920 B.V.V. REST. INC., PARILLA STEAK
HOUSE INC., JOSE HERNANDEZ, JOHN DOES #1-3,
DANIEL TILMAN, OSCAR ROSA, and ANDY
AGUAYO,

Defendants.

WHEREAS, the Court so-ordered the Confidentiality Stipulation and Protective Order (the "Order") (Dkt. No. 18), on January 17, 2017, before remanding the above-captioned action (the "Federal Court Action") (See Dkt. No. 39), to the Supreme Court for County of New York in the case entitled Dowell v. Strong et al., Index No. 158752/2012 (Sup. Ct. NY Co.) (the "State Court Action");

WHEREAS, the only remaining defendants in the State Court Action are Defendants Jose Hernandez, 3920 Bvy. Rest., Inc., and Parilla Steak House, Inc. (the "Remaining Defendants"), each of which is represented by the undersigned attorney;

WHEREAS, this Agreement serves the following purposes: (1) to add the Remaining Defendants and their counsel as parties to the Order so Ms. Dowell may produce the documents protected by the Order (the "Protected Documents") in the State Court Action without violating the Order; (2) to extend the "attorney's eyes-only" designation to the documents protected by the Order; (3) to extend the same rights, privileges, and restrictions enjoyed by the attorneys for the defendants previously in the Federal Court Action to the attorneys for the Remaining Defendants

and Plaintiff in the State Court Action; and (4) to make Plaintiff's attorney a party to this Agreement for ease of administration; and

WHEREAS, the parties to this Agreement pledge to work together in good faith to resolve potential conflicts with it that may arise during the State Court Action;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that the City of New York does not challenge Plaintiff's disclosure of the Protected Documents so long as the attorneys for Plaintiff and the Remaining Defendants honor all provisions in the Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that Plaintiff (and her attorney) shall act in accordance with the Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, that the Remaining Defendants (and their attorney) shall act in accordance with the Order.

Dated: September 29, 2018




Mark Marino, Esq.
MARK A. MARINO, P.C.
380 Lexington Avenue, 17th Floor
New York, NY 10168
Tel: (212) 748-9552
Counsel for Plaintiff Colleen Dowell

Dated: October 1, 2018



Daniel M. O'Hara, Esq.
McLoughlin O'Hara, LLP
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: (212) 867-8283
Attorneys for the Remaining Defendants

Dated: 9/24/18


Shandon Engle, Esq.
CORPORATION COUNSEL
OF THE CITY OF NEW YORK
100 Church Street
New York, NY 10007
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Counsel for the City of New York

SO ORDERED:


HON. NAOMI R. BUCHWALD
UNITED STATES DISTRICT JUDGE

10/2/18